

EXHIBIT C

UnitedLex Timeline

- March 29, 2017 Plaintiffs serve a subpoena directly on the Pepper law firm, seeking their files related to work done for Baylor. (Dkt. 328-1)
- February 6, 2017 Smith and Gomez leave Pepper and join Cozen O'Connor.
- June 6, 2018 Plaintiffs file Motion to Compel the Pepper firm to produce documents subject to Plaintiffs' March 29, 2017 subpoena. (Dkt. 328)
- June 21, 2019 Court issues Order that the parties confer and select a third-party vendor to conduct a comparison of Pepper's documents to the documents Baylor logged or produced. The parties ultimately select UnitedLex. (Dkt. 667)
- January 15, 2020 UnitedLex provides its final report on the comparison, finding 33,377 unmatched documents out of 1,365,293 documents. (Dkt. 777)
- February 2020 to September 2020 Baylor provides additional information to UnitedLex and works with UnitedLex to run additional comparisons of Pepper's documents to Baylor's production, reducing their list of unmatched documents to 12,129..
- November 4, 2020 Plaintiffs file Motion seeking sanctions related to the remaining documents that UnitedLex reports are unmatched. (Dkt. 904)
- April 26, 2021 Judge Austin issues Order granting in part and denying in part Plaintiffs' Motion for Sanctions on the UnitedLex documents, ordering release of 1,793 documents. (Dkt. 941)
- May 5, 2021 Baylor appeals Judge Austin's Order on UnitedLex sanctions. (Dkt. 947)
- February 8, 2022 Court issues Order, affirming in part and reversing in part Judge Austin's Order, directing UnitedLex to re-compare 4,200 privileged Pepper documents that Baylor represented it had previously logged, the result of which would be "conclusive." (Dkt. 1026)
- April 26, 2022 UnitedLex provides its re-comparison of the 4,200 documents, stating it was able to match an additional 3,118 documents, but that it was unable to match 948 documents and 134 documents did not have a "comparison file."
- May 20, 2022 UnitedLex completes production of unmatched documents from its re-comparison pursuant to the terms of the Court's Order that it is conclusive.